

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

Case No. 2:20-cv-00983-TSZ

STIPULATION AND [PROPOSED]
ORDER REGARDING EXPERT MOTION
DEADLINE

NOTED: January 5, 2023

STIPULATION

The parties have conferred regarding the pending deadline for motions regarding expert witnesses currently set for January 12, 2023. The parties believe that two of the three motions currently pending before the Court – Plaintiffs’ motion for sanctions that includes a request for entry of judgment and Defendant’s motion for summary judgment – could materially affect the need for, or scope and content of, any motions regarding expert witnesses.

The parties therefore stipulate and request that the Court enter an order changing the current deadline from January 12, 2023, to February 16, 2023, to allow the parties to adjust their motions based on any orders the Court may issue prior to February 16, while avoiding any need for a continuance of the trial date.

STIPULATION AND [PROPOSED] ORDER
REGARDING EXPERT MOTION DEADLINE
(Case No. 2:20-cv-00983-TSZ) - 1

MORGAN, LEWIS & BOCKIUS LLP
ATTORNEYS AT LAW
1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101
TEL +1.206.274.6400 FAX +1.206.274.6401

1 The parties also request that the expert motions be treated as fourth Friday motions rather
2 than third Friday motions, as currently contemplated in the amended scheduling order, Dkt. 98.

3 STIPULATED AND AGREED TO this 5th day of January, 2023.
4

5 **MORGAN LEWIS & BOCKIUS LLP**

6 By /s/ Angelo Calfo

7 Patricia A. Eakes, WSBA No. 18888
8 Angelo J. Calfo, WSBA No. 27079
9 Tyler S. Weaver, WSBA No. 29413
10 Gabe Reilly-Bates, WSBA No. 52257
11 Andrew DeCarlow, WSBA No. 54471
12 Henry Phillips, WSBA No. 55152
13 1301 Second Avenue, Suite 2800
14 Seattle, WA 98101
15 Phone: (206) 274-6400
16 Fax: (206) 274-6401
17 Email: patty.eakes@morganlewis.com
18 angelo.calfo@morganlewis.com
19 tyler.weaver@morganlewis.com
20 gabriel.reillybates@morganlewis.com
21 andrew.decarlow@morganlewis.com
22 henry.phillips@morganlewis.com

23 *Attorneys for Plaintiffs*

24 **ANN DAVISON**

25 Seattle City Attorney

26 By: /s Joseph Groshong

Joseph Groshong, WSBA No. 41593
Assistant City Attorneys
Seattle City Attorney's Office
701 Fifth Avenue, Suite 2050
Seattle, WA 98104
Phone: (206) 684-8200
Fax: (206) 684-8284
E-mail: Joseph.Groshong@seattle.gov

-and-

**HARRIGAN LEYH FARMER & THOMSEN
LLP**

By /s/ Shane P. Cramer

Arthur W. Harrigan, Jr., WSBA #1751

Tyler L. Farmer, WSBA #39912

Shane P. Cramer, WSBA #35099

Erica Iverson, WSBA #59627

999 Third Avenue, Suite 4400

Seattle, WA 98104

Seattle, WA 98104

Phone: (206) 623-1700

Fax: (206) 623-8717

E-mail: arthurh@harriganleyh.com

tylerf@harriganleyh.com

shanec@harriganleyh.com

ericai@harriganleyh.com

Attorneys for Defendant City of Seattle

[PROPOSED] ORDER

Having considered the parties' stipulation, the Court hereby orders that the deadline for filing motions related to expert witnesses shall be moved from January 12, 2023, to February 16, 2023. Expert motions shall be noted on the calendar no later than the fourth Friday thereafter.

Dated: January __, 2023.

THE HONORABLE THOMAS S. ZILLY
U.S. DISTRICT COURT JUDGE

Presented by:

MORGAN LEWIS & BOCKIUS LLP

By /s/ Angelo Calfo
Patricia A. Eakes, WSBA No. 18888
Angelo J. Calfo, WSBA No. 27079
Tyler S. Weaver, WSBA No. 29413
Gabe Reilly-Bates, WSBA No. 52257
Andrew DeCarlow, WSBA No. 54471
Henry Phillips, WSBA No. 55152
1301 Second Avenue, Suite 2800
Seattle, WA 98101
Phone: (206) 274-6400
Fax: (206) 274-6401
Email: patty.eakes@morganlewis.com
angelo.calfo@morganlewis.com
tyler.weaver@morganlewis.com
gabriel.reillybates@morganlewis.com
andrew.decarlow@morganlewis.com
henry.phillips@morganlewis.com

Attorneys for Plaintiffs

-and-

1 **ANN DAVISON**

Seattle City Attorney

2 By: /s/ Joseph Groshong

3 Joseph Groshong, WSBA No. 41593

Assistant City Attorneys

4 Seattle City Attorney's Office

701 Fifth Avenue, Suite 2050

5 Seattle, WA 98104

Phone: (206) 684-8200

6 Fax: (206) 684-8284

E-mail: Joseph.Groshong@seattle.gov

8 **HARRIGAN LEYH FARMER & THOMSEN LLP**

9 By: /s/ Shane P. Cramer

10 Arthur W. Harrigan, Jr., WSBA #1751

Tyler L. Farmer, WSBA #39912

11 Shane P. Cramer, WSBA #35099

Erica Iverson, WSBA #59627

12 999 Third Avenue, Suite 4400

Seattle, WA 98104

13 Seattle, WA 98104

Phone: (206) 623-1700

14 Fax: (206) 623-8717

E-mail: arthurh@harriganleyh.com

15 tylerf@harriganleyh.com

shanec@harriganleyh.com

16 ericai@harriganleyh.com

17 *Attorneys for Defendant City of Seattle*